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JUNE 5, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAY 22 2008
MAY 2 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Steve Jackson

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

08CV2520
JUDGE PALLMEYER
MAGISTRATE JUDGE ASHMAN

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

Tom Dart — SALVADOR GODINEZ
SUOT, ANDREWS
V. ALEXANDER — MS. HOOPER
MS. SANKEY
ROSHONDA CARROLL — MR. WARREN
MR. MARTINEZ — Mr. Mueller
C/O FUGATE, WOODS

MS. JACKSON

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: Steve Jackson
- B. List all aliases: Derrick Jackson
- C. Prisoner identification number: 20060060297
- D. Place of present confinement: Cook County Dept. of Corrections
- E. Address: 2600 S. CALIFORNIA CHGO, IL 60608 DIV. 10-2A

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Tom Dart
 Title: Sheriff of Cook County
 Place of Employment: _____
- B. Defendant: SALVADOR GODINEZ
 Title: Director of the Cook County Dept. of Corrections
 Place of Employment: _____
- C. Defendant: Supt. ANDREWS
 Title: Superintendent of Div. 10 - Cook County Jail
 Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

II. Defendant(s):

D. Defendant: V. ALEXANDER

Title: Head Sup. of LAW library

Place of Employment: Cook County Dept. of corrections.

E. Defendant: MS. Hooper

Title: Sup. of LAW Library

Place of Employment: Cook County Dept. of corrections.

F. Defendant: MS. Sankey

Title: LAW Library Personnel

Place of Employment: Cook County Dept. of corrections.

G. Defendant: Mr. Mueller

Title: HEAD Sup. CRW - Social Worker

Place of Employment: Cook County Dept. of corrections.

H. Defendant: Roshonda CARROLL

Title: Sup. CRW - Social worker

Place of Employment: Cook County Dept. of corrections.

I. ~~Mr. Warren~~ Defendant: Mr. Warren

~~Place of Employment:~~ Title: Sup. CRW - Social worker

Place of Employment: Cook County Dept. of corrections.

J. Defendant: Mr. Martinez

Title: CRW - Social worker

Place of Employment: Cook County Dept. of corrections.

K. Defendant: MS. Fugate, Woods

Title: Correctional officer

Place of Employment: Cook County Dept. of corrections.

II Defendant(s):

1. Defendant: MS JACKSON

Title: Sup. of LAW LIBRARY

Place of employment: Cook county Dept. of corrections.

III. Exhaustion of Administrative Remedies

You are required to exhaust all your available administrative remedies before bringing an action in federal court.

A. Is there a grievance procedure available at your institution?

YES (☒) NO () If there is no grievance procedure, skip to F.

B. Have you filed a grievance concerning the facts in this complaint?

YES (☒) NO ()

C. If your answer is YES:

1. What steps did you take?

I Grieved the Law Librarians. Then I appealed their responses.

2. What was the result?

They're saying they can look through my legal mail and they CAN take my legal mail from me. ^{and read}

3. If the grievance was not resolved to your satisfaction, did you appeal? What was the result (if there was no procedure for appeal, so state.)

I Appealed their responses. They said they can do what they want.

D. If your answer is NO, explain why not:

E. Is the grievance procedure now completed? YES (☒) NO ()

F. If there is no grievance procedure in the institution, did you complain to authorities? YES () NO ()

G. If your answer is YES:

1. What steps did you take?

2. What was the result?

H. If your answer is NO, explain why not:

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: Steve Jackson VS
~~Steve Jackson VS~~ City of Chicago et al 07C 1066
- B. Approximate date of filing lawsuit: Dec. 17 07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Steve
JACKSON
- D. List all defendants: City of Chicago, Chicago Police
Department, Phillip Cline, Sgt Bates, Officer Singleton,
officer LaFredo
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District of Illinois
- F. Name of judge to whom case was assigned: Judge Andersen
- G. Basic claim made: Police Brutality
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still Pending
- I. Approximate date of disposition: Still Pending

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Tom Dart is the Sheriff of the county of Cook. He is Responsible
(AND) the overall functions of the C.C. Jail.)
for all activities of his personnell. I've sent Numerous UNANSWERED
Letters to him about the conduct of the Law library personnell,
CRW-Social worker staff- and his correctional officers. He
has not ANSWERED my letters. There was No Relief given through him.
SALVADOR GODINEZ is the Director of the Cook County Jail. He too
is Responsible for all activities of his personnell, And the overall functions
of the Cook County Jail. I've sent Numerous UNANSWERED Letters to
him about the conduct of the Law Library personnell, CRW-Social worker
staff- and his correctional officers. He has not ANSWERED my letters.
There was No Relief given through him.
Supt. ANDREWS is the Supt. of Div. 10, in the Cook County Dept.
of Corrections. He is Responsible for all Activities of his personnell,
and the overall functions of Div. 10. I've sent him Numerous
UNANSWERED Letters to him about the conduct of the Law library
Personnell, CRW-Social worker staff- and the correctional
officers. ON Dec 24th 07, the Supt. came ON the tier (2A)
He came to ADDRESS other CONCERNS, but I was able to talk

with him about the problems I'm having in the law library.
 I Explained to him that I had a court order that was not being
 honored. He Referred me to one of his Lieutenants
 The Lieutenant said if my court order isn't honored, I should
 Grieve the matter, Let my Judge know it's not being honored then
 I should write to you. Nevertheless, they did nothing.
 V. Alexander is the Head Sup. of the law library. I've Grieved
 the law library Numerous times concerning them opening, Reading
 and looking through my legal mail. They've admitted violating
 my Constitutional Rights to the Social Worker (Mr. Warren)
 I've wrote MS Alexander stating that they were taking my
 legal mail from me, Telling me that the mail Room would be
 Picking my legal mail up. Also, I asked if they would give me
 A Signature stating they were taking my legal mail from me.
 MS Alexander said they didn't have to give me Nothing. She
 said if I was an inmate with no money on the books, that
 the only way my mail was going out, was to give my legal
 mail to them. They put stamps on the other inmates legal mail
 and then gave their legal mail back to them. I have staff
 and Inmates who've witness these Incidents. My
 Witnesses are: Dennis Plummer
 Bobby HARRIS - 20040072892, KEVIN Johnson, 20040091307,

Case 1:08-cv-02520 Document 9 Filed 06/05/2008 Page 10 of 14
and many other inmates the Supt. knew about this, Capt. Martinez and many other staff members. I also have the Responses to all the uncivil acts I've Grieved. They've Admitted doing these wrong things to me.

MS Hooper is one of the Supervisors. She is the first of the two Law Librarians who looked through my legal mail. When I asked her why she was looking through my legal mail, she said "I'm making sure there is no legal garbage on the wrong folks." She would take documents out of my legal mail. MS Hooper was always very unprofessional when it deals with me. She was the first who told me they would be taking my ^{legal} mail to the mail room. I would always tell her that if that were the rules, then give me her signature stating she would be taking my ^{legal} mail from me. She would never do that. She would always become angry with me and throw me out of the Law library.

MS Sankey is the law librarian who's normally working Div. 10 Law library. She's the person who did not honor my court order to visit the law library. On several occasions MS Sankey's boyfriend approached me with some of his gang members with shanks about me grieving her. Internal Affairs had to get involved and get the gang members to back up off me. Counselor Warren knows about this. MS. Sankey always wanted to take my legal mail from me. ^(and read it) ON three occasions she did take my mail. Clofugate has been a witness to MS. Sankey taking my

Legal mail from me. MS Sankey would never send my legal mail out unless I stood there while she went through it. I've written numerous grievances about ms. SANKEY's behavior. None of the counselors helped me with this matter. The law librarians have made up numerous lies about me. They've tried every thing to keep me out of the Law Library. They would tell some of the inmates that I was locked up for a string of rapes. Inmate were believing I was in for Rape.

C/O Woods-fugate was the C/O present on my last visit to the Law Library before they barred me out of the law library. MS. fugate told me she sided with them only because she didn't know about the things that had taken place before she became the Law library officer. She still was collaborating with the Law Librarians who barred me out. She later confessed that she had got the story wrong. Some of the other C/O's who knew about what was happening told her. I'm including MS. fugate in my lawsuit because if she had told the truth from the beginning, I would not have been barred. MS. fugate should have told the Supt. that I said, if they want to take my legal mail from me, then I want the signature of the person who's taking my legal mail from me.

Rashonda Carroll is one of the head counselors. I've written numerous grievances about this matter. She's gotten the responses from the Law librarians admitting they've taken my legal mail from me. I've appealed this situation to her. She knew about the Law librarians not calling me to the law library for three weeks. Yet, she did nothing to help me.

Case # 08-102520, Richmond, CA 06/05/2008, Page 12 of 14
from my Understanding, Richmond and Mr. Warren and Mr. Mueller are Supervisors.

MR. WARREN Did come see me a couple of times about the Situation. He knows about everything that happened in the Law library. I Admit, he did try to help me in the beginning, but once they stopped honoring my court order, he told the Counselor, (Martinez) not to help me with getting my legal court papers copied. Also he told Counselor Martinez not to help me with sending out my legal mail. When the Law librarians stopped me from coming to the Law library for three weeks, I had no way to prepare for court. Mr. Warren would promise to get my legal mail sent out and help me to get copies of my legal documents. He never kept his promises. In the end, he joined the bandwagon of the Law librarians.

Mr Mueller is one of the Counseling Supervisors. I've wrote numerous letters to him about the things that took place in Div. 10 Law library. My Grievances went to him as well. He too did nothing to help me.

Mr. Martinez was the Counselor I dealt with on the every day basis. He would tell me he contacted Mr. Warren all the time. He tried helping me once. He brought me five write-out to send out some very important mail. Mostly, I've entered his name to use as a witness. He would say that the Law library Dept. was wrong, but he would also say there is nothing he could do about it. Maybe there wasn't anything he could do to help me. I'll let the court decide.

MS. JACKSON is one of the LAW Library Supervisors. She came over to Div. ten with MS. Hooper (supervisor) a couple of times. The Reason I'm putting MS. JACKSON in this complaint is because when I tried to talk with her about the way I was being mistreated by the other LAW Librarians, she told me to shut the hell up. She then told me not to talk to her about anything. She was very disrespectful to me also.

Also, I feel it was very wrong for the LAW Library Dept. to allow these law Librarians to take my Legal mail from me knowing I had Grieved these LAW Librarians. I feel it was wrong for these LAW Librarians to spread the Rumor that I had Raped over 20 Women. This Entire Division wanted to kill me. I have witnesses to these things. The LAW Library Dept. Always gave me Problems when it came to getting Copies of my Legal work to prepare for Courts. These LAW Librarians always Told my Private business to IN mates. The LAW Library Dept. Did Every thing they Possibly could to Sabotage my Criminal Defense. I've missed Numerous deadlines on getting Copies of motions. There are times they claimed they gave me Copies when I Attended the LAW Library. They lied knowing I never Signed for Copies. Every time it seemed as though Every thing was cooling down, they would Always come with something New. My Life has been threatened because of MS. Sankey (LAW Librarian in Div. 10). Internal Affairs had to get Involved. This situation Really took it's Toll on me. I hope and Pray that this honorable Court will help me.

Thank you and God bless.

Also, I Just Recently found out that the LAW Librarians (MS. Hooper & MS. Sankey) both were wrong for Reading my Legal mail. The witnesses I've Provided in These forms will testify that my Legal mail was Read, then taken from me.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like this Honorable Court to investigate this
matter. I would like for this matter to be dealt with.
Also, I would like to be compensated for all the ment-
al stress and embarrassment they've caused me.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 17 day of March, 2008

Stevie Jackson

(Signature of plaintiff or plaintiffs)

Stevie Jackson

(Print name)

20060060297

(I.D. Number)

2600 S. CALIFORNIA, Dm 10 3D

Chicago, IL 60608, P.O. box 089002

(Address)